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August 5, 1998

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street N.W, Room 222
Washington DC 20554

Re: Ex Parte Presentation, CC Docket No. 95-116

Dear Ms. Salas,

On Friday, July 31, 1998, Ericsson Inc, represented by Barbara Baffer, Margaret Britt, Gilbert Chien and Warren Sims, met with Janice Jamison, Clint Odom, Jeanine Poltronieri and Paul Dari of the Wireless Bureau regarding Wireless Number Portability (WNP). We discussed, among other things, Ericsson's involvement in WNP, the standard's situation, development timetables, and specific technical issues.

In general, once the standard is available, it can take Ericsson from 12 to 18 months before we can begin deploying the equipment to the customers. The 12 to 18 months lead-time depends on the complexity of the standard. Usually, equipment development takes 8 to 12 months, functional testing takes 3 to 4 months, and customer site testing takes 1 to 2 months.

Attached is a copy of Ericsson's presentation to the Commission. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Barbara Baffer

Barbara A. Baffer
Manager, Regulatory Affairs

Cc: Janice Jamison
Clint Odom
Jeanine Poltronieri
Paul Dari

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ERICSSON INC.
Public Affairs
1634 I Street, NW, Suite 600
Washington, D.C. 20006-4083

Telephone 202-783-2200

FAX 202-783-2206

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Ericsson / FCC Meeting on Wireless Number Portability

Barbara Baffer, Regulatory Affairs
Margaret Britt, Strategic Product Management
Gilbert Chien, Local Product Management
Warren Sims, Business and Industry Relations

Wireless Number Portability (WNP)

- Ericsson Involvement in WNP
- Ericsson Approach to WNP
- Standards Situation
- Development Timetables
- Technical Issues
- Business Impact of a Delay
- Service Provider Perspective
- Other Considerations
- Conclusion

Ericsson Involvement in WNP

- Ericsson has two product lines affected by Wireless Number Portability:
  - a GSM-based system
  - an IS-41-based system
- Wireless Number Portability affects both these product lines, however, the impact to IS-41 networks is more pronounced.
- Ericsson is proactively involved in CTIA, TR45 and T1P1 standards work for WNP.

Ericsson Approach to WNP

- Ericsson is planning to deliver products to support Wireless Number Portability.
- Standards are essential to ensure that this feature works uniformly across networks.
- Development efforts are largely complete at this time.
- Considerable resources have been expended toward meeting the mandate, both for standards and product development.

Standards Situation

GSM - T1P1

- Two phases: Phase 1 addresses both FCC mandates, Phase 2 addresses short message services and service interactions with WNP
- Phase 1 standard was balloted in December 1997
- Phase 2 standard is scheduled to be ready for ballot in October 1998
- Some work done against wireline T1S1 standard and applicability to wireless

IS-41 - TR45.2 NP Ad-hoc

- Three phases: Phase 1 addresses first FCC mandate, Phase 2 addresses second FCC mandate and Phase 3 addresses additional issues and interactions
- Phase 1 was balloted in October 1997 and re- balloted in February 1998
- Phase 2 is scheduled to be ready for ballot in August 1998
- Phase 3 work has not yet begun
- Some work done against wireline T1S1 standard and applicability to wireless

Standards are *essential* to developing a WNP solution.

Technical Issues

GSM

- Short Message Service
- Jurisdiction Indicator Parameter
- Feature Interactions
- Rate Centre Definitions
- Automatic Code Gapping
- Number Pooling Impacts

- Signal Ported Number

IS-41

- Short Message Service
- Jurisdiction Indicator Parameter
- Feature Interactions
- Rate Centre Definitions
- Automatic Code Gapping
- Number Pooling Impacts

- MDN/MIN separation
- Support for ported roamers

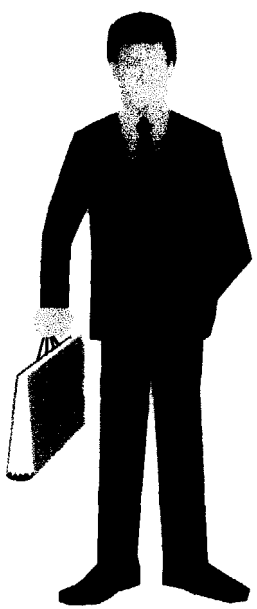
How these outstanding technical issues are resolved could impact standards and our development, including the scheduled release dates, if impacts are large.

Example of MDN/MIN Separation / Ported Roamer Problem

Joe's	MDN	= 514.345.7900 ;
	MIN	= 514.738.8300
Mary's	MDN	= 514.738.8300 ;
	MIN	= 514.256.0100

Joe and Mary, both ported wireless subscribers, roam into a system that does not correctly handle MDN/MIN separation:

- **Joe calls 9-1-1: Mary's number is given as call-back number**
- **Joe makes a call: Mary's number is given as Calling Number Identification and for billing**
- **Mary is under surveillance, but Joe's calls are monitored by law enforcement**
- **Ed calls Mary over the roamer port: Joe receives this call**
- **Joe is a manual roamer, but cannot receive calls over the roamer port**



Business Impact of a Delay

- Ericsson assigns highest development priority to government compliance features in planning its product releases.
- Ericsson has planned its software development for this feature based on the mandated dates.
- Customer interest in this feature, without the FCC mandate, is uncertain, particularly for IS-41 systems because of the ported roamer issue.
- Ericsson's business succeeds when it develops features that its customers want to buy.
- The decisions of the FCC have multi-million dollar consequences on Ericsson and other manufacturers.

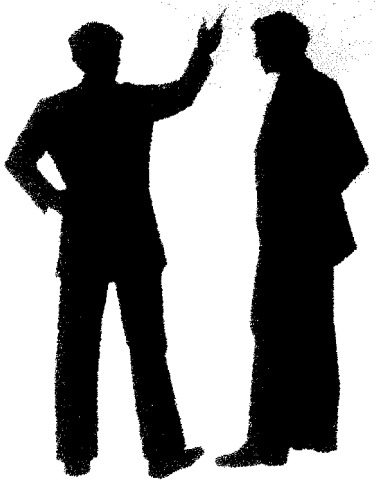
Service Provider Perspective

- Ericsson recognizes the technical and logistical complexities of WNP faced by our customers, the wireless service providers.
- Service providers typically have systems from several vendors to upgrade and integrate.
- Ericsson has a strong business interest in seeing its customers succeed in their deployment of features such as WNP, and does not want to take a position that might hurt them.
- Some unresolved issues constitute a business risk to service providers, especially in light of the IS-41 ported roamer issue.
- Ericsson has worked diligently in defining requirements with customers and in working with them on standards.
- Ericsson understands the service providers' motivation in requesting a delay.

Other Considerations

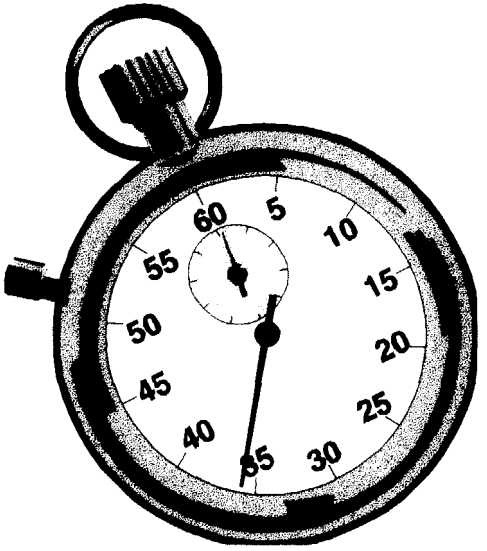
- A nine-month delay (to March 2000) would cause service provider pre-in-service testing of Wireless Number Portability to overlap the millennium shift.

- For IS-41 networks, the requirement that nationwide roaming be supported effectively requires a blanket upgrade of all systems from the smallest to the largest - not just those in the 100 largest Metropolitan Statistical Areas.



Conclusion

- **Ericsson is not pro-delay**
- **Ericsson is not anti-delay**



Ericsson is pro-*QUICK DECISION* on the issue